

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN)
---	-----------------------

This document relates to:

Gordon Aamoth, Sr., et al. v. Islamic Republic of Iran, No. 1:18-cv-12276 (GBD) (SN)
Lloyd A. Abel Sr., et al. v. Islamic Republic of Iran, No. 1:18-cv-11837 (GBD) (SN)
Jessica DeRubbio, et al. v. Islamic Republic of Iran, No. 1:18-cv-05306 (GBD) (SN)
Marinella Hemenway, et al. v. Islamic Republic of Iran, No. 1:18-cv-12277 (GBD) (SN)
Alexander Jimenez, et al. v. Islamic Republic of Iran, No. 1:18-cv-11875 (GBD) (SN)
Chang Don Kim, et al. v. Islamic Republic of Iran, No. 1:18-cv-11870 (GBD) (SN)
Horace Morris, et al. v. Islamic Republic of Iran, No. 1:18-cv-05321 (GBD) (SN)
Cheryl Rivelli, et al. v. Islamic Republic of Iran, No. 1:18-cv-11878 (GBD) (SN)
Matthew Rowenhorst, et al. v. Islamic Republic of Iran, No. 1:18-cv-12387 (GBD) (SN)
Maureen Moody-Theinert, et al. v. Islamic Republic of Iran, No. 1:18-cv-11876 (GBD) (SN)
Roberta Agyeman, et al. v. Islamic Republic of Iran, No. 1:18-cv-05320 (GBD) (SN)
Audrey Ades, et al. v. Islamic Republic of Iran, No. 1:18-cv-07306 (GBD) (SN)
Bakahityar Kamardinova, et al. v. Islamic Republic of Iran, No. 1:18-cv-05339 (GBD) (SN)
Laurence Schlissel, et al. v. Islamic Republic of Iran, No. 1:18-cv-05331 (GBD) (SN)

**[PROPOSED] ORDER OF PARTIAL FINAL DEFAULT JUDGMENTS IN THE
ABOVE-CAPTIONED MATTERS ON BEHALF OF THE PLAINTIFFS IDENTIFIED
IN EXHIBITS A AND EXHIBITS B**

Upon consideration of the evidence and arguments submitted by Plaintiffs identified in Exhibits A and Exhibits B to this Order, Plaintiffs in the above-captioned matters, who are each a spouse, parent, child, or sibling (or the estate of a spouse, parent, child, or sibling) of a victim killed in the terrorist attacks on September 11, 2001 as specifically identified in annexed Exhibits A-1 to A-11 (collectively, "Exhibits A"), or the estate of an individual who was killed in the terrorist attacks on September 11, 2001 as specifically identified in annexed Exhibits B-1 to B-11 (collectively, "Exhibits B"), and the judgment by default for liability only against Defendant Islamic Republic of Iran ("Iran") entered as follows:

CASE NAME	CASE NO.	DATE OF ORDER FOR LIABILITY	ECF NO. FOR ORDER OF LIABILITY
<i>Gordon Aamoth, Sr., et al. v. Islamic Republic of Iran</i>	No. 1:18-cv-12276 (GBD) (SN)	09/03/2019	ECF No. 5050
<i>Lloyd A. Abel Sr., et al. v. Islamic Republic of Iran</i>	No. 1:18-cv-11837 (GBD) (SN)	09/03/2019	ECF No. 5048
<i>Jessica DeRubbio, et al. v. Islamic Republic of Iran</i>	No. 1:18-cv-05306 (GBD) (SN)	05/28/2019	ECF No. 4563
<i>Marinella Hemenway, et al. v. Islamic Republic of Iran</i>	No. 1:18-cv-12277 (GBD) (SN)	09/03/2019	ECF No. 5054
<i>Alexander Jimenez, et al. v. Islamic Republic of Iran</i>	No. 1:18-cv-11875 (GBD) (SN)	09/03/2019	ECF No. 5056
<i>Chang Don Kim, et al. v. Islamic Republic of Iran</i>	No. 1:18-cv-11870 (GBD) (SN)	09/03/2019	ECF No. 5049
<i>Horace Morris, et al. v. Islamic Republic of Iran</i>	No. 1:18-cv-05321 (GBD) (SN)	06/21/2019	ECF No. 4595
<i>Cheryl Rivelli, et al. v. Islamic Republic of Iran</i>	No. 1:18-cv-11878 (GBD) (SN)	09/03/2019	ECF No. 5047
<i>Matthew Rowenhorst, et al. v. Islamic Republic of Iran</i>	No. 1:18-cv-12387 (GBD) (SN)	09/03/2019	ECF No. 5053
<i>Maureen Moody-Theinert, et al. v. Islamic Republic of Iran</i>	No. 1:18-cv-11876 (GBD) (SN)	09/03/2019	ECF No. 5055
<i>Roberta Agyeman, et al. v. Islamic Republic of Iran</i>	No. 1:18-cv-05320 (GBD) (SN)	06/21/2019	ECF No. 4597
<i>Audrey Ades, et al. v. Islamic Republic of Iran</i>	No. 1:18-cv-07306 (GBD) (SN)	06/21/2019	ECF No. 4594
<i>Bakahityar Kamardinova, et al. v. Islamic Republic of Iran</i>	No. 1:18-cv-05339 (GBD) (SN)	06/21/2019	ECF No. 4596
<i>Laurence Schlissel, et al. v. Islamic Republic of Iran</i>	No. 1:18-cv-05331 (GBD) (SN)	06/21/2019	ECF No. 4598

; together with the entire record in this case; IT IS HEREBY

ORDERED that service of process in the above-captioned matter(s) was effected upon Iran in accordance with 28 U.S.C. § 1608(a) for sovereign defendants and 28 U.S.C. § 1608(b) for agencies and instrumentalities of sovereign defendants; and it is further

ORDERED that partial final judgment is entered against Iran on behalf of the Plaintiffs in the above-captioned matters, as identified in the attached Exhibits A, who are each a spouse, parent, child, or sibling (or the estate of a spouse, parent, child, or sibling) of an individual killed in the terrorist attacks on September 11, 2001, as indicated in the attached Exhibits A; and it is further

ORDERED that Plaintiffs identified in the attached Exhibits A are awarded solatium damages of \$12,500,000 per spouse, \$8,500,000 per parent, \$8,500,000 per child, and \$4,250,000 per sibling, as set forth in the attached Exhibits A; and it is further

ORDERED that partial final judgment is entered against Iran on behalf of the Plaintiffs in the above-captioned matters, as identified in the attached Exhibits B, who are each the estate of a victim of the terrorist attacks on September 11, 2001, as indicated in the attached Exhibits B; and it is further

ORDERED that Plaintiffs identified in the attached Exhibits B are awarded compensatory damages for decedents' pain and suffering in an amount of \$2,000,000 per estate, as set forth in the attached Exhibits B; and it is further


ORDERED that Plaintiffs identified in the expert reports submitted in support of the Declaration of Jerry S. Goldman, Esq. ("Goldman Declaration") (and identified in Exhibits B), are awarded economic damages as set forth in the attached Exhibits B and as supported by the expert reports and analyses tendered in conjunction with the Goldman Declaration; and it is further

ORDERED that the Plaintiffs identified in the attached Exhibits A and Exhibits B are awarded prejudgment interest of 4.96 percent per annum, compounded annually, running from September 11, 2001 until the date of judgment; and it is further

ORDERED that the Plaintiffs identified in the attached Exhibits A and Exhibits B may submit an application for punitive damages, economic damages, or other damages (to the extent such awards have not previously been ordered) at a later date consistent with any future rulings made by this Court on this issue; and it is further

ORDERED that the remaining Plaintiffs in the above-captioned matters not appearing in the attached Exhibits A and Exhibits B may submit in later stages applications for damages awards, and to the extent they are for solatium damages or by estates for compensatory damages or for decedents' pain and suffering from the September 11th attacks, they will be approved consistent with those approved herein for the Plaintiffs appearing in the attached Exhibits A and Exhibits B.

SO ORDERED:



GEORGE B. DANIELS
United States District Judge

Dated: New York, New York
JAN 04 2022

EXHIBIT A

Ex. A-1

Jessica DeRubbio, et al. v. Islamic Republic of Iran, No. 1:18-cv-05306 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	PLAINTIFF First Name	PLAINTIFF Middle Name	PLAINTIFF Last Name	PLAINTIFF Suffix	Relationship to 9/11 Decedent	SOLATIUUM DAMAGES AMOUNT
1.	Sadie	I.	Ette	Edu		Umana		Sibling	\$4,250,000.00
2.	Sadie	I.	Ette	Sunday	Itauma	Ette		Parent (Deceased)	\$8,500,000.00
3.	Francis	Jude	Feely	Stephen	Joseph	Feely		Sibling	\$4,250,000.00
4.	Francis	Jude	Feely	Alice		Feely		Sibling	\$4,250,000.00
5.	Jennifer	Lynn	Howley	Matthew	Franklin	Dorsey		Sibling	\$8,500,000.00
6.	Maxima		Jean-Pierre	Andy	Alberto	Jean-Pierre		Child	\$8,500,000.00
7.	Maxima		Jean-Pierre	Rachel		Jean-Pierre		Child	\$8,500,000.00
8.	Maxima		Jean-Pierre	Anjunelly		Jean-Pierre		Child	\$8,500,000.00
9.	Maxima		Jean-Pierre	Ajax		Jean-Pierre	Jr.	Child	\$8,500,000.00
TOTAL									\$59,500,000.00

Ex. A-2

Horace Morris, et al. v. Islamic Republic of Iran, No. 1:18-cv-05321 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	PLAINTIFF First Name	PLAINTIFF Middle Name	PLAINTIFF Last Name	PLAINTIFF Suffix	Relationship to 9/11 Decedent	SOLATIUUM DAMAGES AMOUNT
1.	Nancy	Yuen	Ngo	Ashley		Ngo		Child	\$8,500,000.00
2.	Nancy	Yuen	Ngo	Lindsay		Ngo		Child	\$8,500,000.00
3.	Chin	Sun	Pak Wells	Chin	Yong	Wells		Sibling	\$4,250,000.00
4.	Anthony		Portillo	Zachary		Portillo		Sibling	\$4,250,000.00
5.	Robert	D.	Pugliese	Josephine		Pugliese		Parent	\$8,500,000.00
6.	Deborah	Ann	Ramsaur	Ernest	Louis	LaRoche		Sibling	\$4,250,000.00
7.	Susan	Ann	Ruggiero	William		Grigonis		Sibling	\$4,250,000.00

TOTAL**\$42,500,000.00**

Ex. A-3

Audrey Ades, et al. v. Islamic Republic of Iran, No. 1:18-cv-07306 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	PLAINTIFF First Name	PLAINTIFF Middle Name	PLAINTIFF Last Name	PLAINTIFF Suffix	Relationship to 9/11 Decedent	SOLATIUM DAMAGES AMOUNT
1.	Patrick	Jude	Murphy	Casey	Akira	Murphy		Child (Deceased)	\$8,500,000.00

\$8,500,000.00**TOTAL**

Ex. A-4

Lloyd A. Abel Sr., et al. v. Islamic Republic of Iran, No. 1:18-cv-11837 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	PLAINTIFF First Name	PLAINTIFF Middle Name	PLAINTIFF Last Name	PLAINTIFF Suffix	Relationship to 9/11 Decedent	SOLATIUM DAMAGES AMOUNT
1.	Vernon	P.	Cherry	Ryan		Cherry		Child (Deceased)	\$8,500,000.00
2.	Benjamin	K.	Clark	Benjamin		Clark		Parent (Deceased)	\$8,500,000.00
3.	Michael	Sean	Curtin	Jennifer		Sullivan		Child	\$8,500,000.00

\$25,500,000.00**TOTAL**

Ex. A-5

Chang Don Kim, et al. v. Islamic Republic of Iran, No. 1:18-cv-11870 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	PLAINTIFF First Name	PLAINTIFF Middle Name	PLAINTIFF Last Name	PLAINTIFF Suffix	Relationship to 9/11 Decedent	SOLATIUM DAMAGES AMOUNT
1.	Catherine	K.	Fagan	Christopher		Fagan		Child	\$8,500,000.00
2.	Sean	B.	Fegan	Margaret	Colette	Fegan		Parent (Deceased)	\$8,500,000.00
3.	John	Roger	Fisher	Anne	T.	Fisher		Parent (Deceased)	\$8,500,000.00
4.	Lawrence	Don	Kim	Soh	Ryang	Kim		Parent (Deceased)	\$8,500,000.00

TOTAL

\$34,000,000.00

Ex. A-6

Alexander Jimenez, et al. v. Islamic Republic of Iran, No. 1:18-cv-11875 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	PLAINTIFF First Name	PLAINTIFF Middle Name	PLAINTIFF Last Name	PLAINTIFF Suffix	Relationship to 9/11 Decedent	SOLATIUM DAMAGES AMOUNT
1.	Lisa	Yvonne	Kearney-Griffin	Lorraine		Kearney		Parent (Deceased)	\$8,500,000.00
2.	James	T.	Lynch	Patricia		Singh		Child	\$8,500,000.00
3.	Wesley		Mercer	Garland		Mercer		Sibling	\$4,250,000.00

\$21,250,000.00**TOTAL**

Ex. A-7

Maureen Moody-Theinert, et al. v. Islamic Republic of Iran, No. 1:18-cv-11876 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	PLAINTIFF First Name	PLAINTIFF Middle Name	PLAINTIFF Last Name	PLAINTIFF Suffix	Relationship to 9/11 Decedent	SOLATIUM DAMAGES AMOUNT
1.	Zandra	Marie	Cooper Ploger	Zenaida	Frances	Flores		Parent (Deceased)	\$8,500,000.00
2.	Gerard	Patrick	Moran	Joyce	Athena	Moran		Spouse (Deceased)	\$12,500,000.00
3.	Gerard	Patrick	Moran	Dane	Michael	Moran		Child (Deceased)	\$8,500,000.00

TOTAL**\$29,500,000.00**

Ex. A-8
Cheryl Rivelli, et al. v. Islamic Republic of Iran, No. 1:18-cv-11878 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	PLAINTIFF First Name	PLAINTIFF Middle Name	PLAINTIFF Last Name	PLAINTIFF Suffix	Relationship to 9/11 Decedent	SOLATIUM DAMAGES AMOUNT
1.	Dianne	Theresa	Signer	James	Matthew	Signer		Sibling	\$4,250,000.00
2.	Bonnie		Smithwick	Jeanne	Santamarie	Shihadeh		Parent (Deceased)	\$8,500,000.00
3.	Bonnie		Smithwick	Theodore	D.	Shihadeh		Parent (Deceased)	\$8,500,000.00

\$21,250,000.00

TOTAL

Ex. A-9

Gordon Aamoth, Sr., et al. v. Islamic Republic of Iran, No. 1:18-cv-12276 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	PLAINTIFF First Name	PLAINTIFF Middle Name	PLAINTIFF Last Name	PLAINTIFF Suffix	Relationship to 9/11 Decedent	SOLATUM DAMAGES AMOUNT
1.	Vivian		Casaldue	Daniel		Acevedo		Sibling	\$4,250,000.00
2.	Francis	Albert	DeMartini	Dominic	Francis	DeMartini		Child	\$8,500,000.00

\$12,750,000.00**TOTAL**

Ex. A-10

Marinella Hemenway, et al. v. Islamic Republic of Iran, No. 1:18-cv-12277 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	PLAINTIFF First Name	PLAINTIFF Middle Name	PLAINTIFF Last Name	PLAINTIFF Suffix	Relationship to 9/11 Decedent	SOLATUM DAMAGES AMOUNT
1.	Ronald	John	Hemenway	Sheri	Lynn	Berger		Sibling	\$4,250,000.00
2.	Lincoln		Quappe	Clint	Lincoln	Quappe		Child	\$8,500,000.00
3.	Lincoln		Quappe	Natalie	Jane	Quappe		Child	\$8,500,000.00
4.	Laura	Marie	Ragonese-Snik	John	W.	Snik		Spouse (Deceased)	\$12,500,000.00
5.	John	Frederick	Rhodes	Deborah	Ann	Malek		Child	\$8,500,000.00
6.	John	Frederick	Rhodes	Linda	Patricia	Rhodes		Spouse	\$12,500,000.00

\$54,750,000.00**TOTAL**

Ex. A-11

Matthew Rowenhorst, et al. v. Islamic Republic of Iran, No. 1:18-cv-12387 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	PLAINTIFF First Name	PLAINTIFF Middle Name	PLAINTIFF Last Name	PLAINTIFF Suffix	Relationship to 9/11 Decedent	SOLATIUUM DAMAGES AMOUNT
1.	Edwin	J.	Graf	Wesley	J.	Graf		Child	\$8,500,000.00
2.	Leonard	Anthony	White	Nelson	Oscar	White	Jr.	Sibling	\$4,250,000.00
3.	Leonard	Anthony	White	Robert	Rawlston	White		Sibling	\$4,250,000.00

\$17,000,000.00**TOTAL**

EXHIBIT B

Ex. B-1

Jessica DeRubbio, et al. v. Islamic Republic of Iran, No. 1:18-cv-05306 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	Suffix Name	Economic Damage Amount	Non-Economic Damage Amount	TOTAL Damage Amount
1.	Stephen	N.	Hyland		\$1,717,572.00		\$1,717,572.00

TOTALS

\$1,717,572.00 \$1,717,572.00

Ex. B-2

Roberta Agyeman, et al. v. Islamic Republic of Iran, No. 1:18-cv-05320 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	Suffix Name	Economic Damage Amount	Non-Economic Damage Amount	TOTAL Damage Amount
1.	Felix		Calixte		\$931,052.00		\$931,052.00

TOTALS

\$931,052.00 \$931,052.00

Ex. B-3

Horace Morris, et al. v. Islamic Republic of Iran, No. 1:18-cv-05321 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	Suffix Name	Economic Damage Amount	Non-Economic Damage Amount	TOTAL Damage Amount
1.	Venesha		Richards		\$3,096,981.00		\$3,096,981.00

TOTALS

					\$3,096,981.00		\$3,096,981.00
--	--	--	--	--	----------------	--	----------------

Ex. B-4

Laurence Schlissel, et al. v. Islamic Republic of Iran, No. 1:18-cv-05331 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	Suffix Name	Economic Damage Amount	Non-Economic Damage Amount	TOTAL Damage Amount
1.	Gabriela		Waisman		\$1,969,027.00		\$1,969,027.00
2.	Yuk	Ping	Wong		\$633,339.00		\$633,339.00

TOTALS

					\$2,602,366.00		\$2,602,366.00
--	--	--	--	--	----------------	--	----------------

Ex. B-5

Bakahityar Kamardinova, et al. v. Islamic Republic of Iran, No. 1:18-cv-05339 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	Suffix Name	Economic Damage Amount	Non-Economic Damage Amount	TOTAL Damage Amount
1.	Carlos	A.	Montoya		\$3,964,595.00		\$3,964,595.00

TOTALS

\$3,964,595.00

\$3,964,595.00

Ex. B-6

Audrey Ades, et al. v. Islamic Republic of Iran, No. 1:18-cv-07306 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	Suffix Name	Economic Damage Amount	Non-Economic Damage Amount	TOTAL Damage Amount
1.	Angelene	C.	Carter		\$1,248,607.00	\$2,000,000.00	\$3,248,607.00

TOTALS

\$1,248,607.00	\$2,000,000.00	\$3,248,607.00
----------------	----------------	-----------------------

Ex. B-7

Chang Don Kim, et al. v. Islamic Republic of Iran, No. 1:18-cv-11870 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	Suffix Name	Economic Damage Amount	Non-Economic Damage Amount	TOTAL Damage Amount
1.	Wanda		Green		\$688,245.00		\$688,245.00

TOTALS

\$688,245.00

\$688,245.00

Ex. B-8

Alexander Jimenez, et al. v. Islamic Republic of Iran, No. 1:18-cv-11875 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	Suffix Name	Economic Damage Amount	Non-Economic Damage Amount	TOTAL Damage Amount
1.	Paul	Hanlon	Keating		\$1,487,799.00		\$1,487,799.00

TOTALS

\$1,487,799.00

\$1,487,799.00

Ex. B-9

Maureen Moody-Theinert, et al. v. Islamic Republic of Iran, No. 1:18-cv-11876 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	Suffix Name	Economic Damage Amount	Non-Economic Damage Amount	TOTAL Damage Amount
1.	Gerard		Moran			\$2,000,000.00	\$2,000,000.00

TOTALS

\$2,000,000.00 \$2,000,000.00

Ex. B-10

Cheryl Rivelli, et al. v. Islamic Republic of Iran, No. 1:18-cv-11878 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	Suffix Name	Economic Damage Amount	Non-Economic Damage Amount	TOTAL Damage Amount
1.	Catherina		Robinson		\$553,479.00		\$553,479.00

TOTALS

\$553,479.00

\$553,479.00

Ex. B-11

Marinella Hemenway, et al. v. Islamic Republic of Iran, No. 1:18-cv-12277 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	Suffix Name	Economic Damage Amount	Non-Economic Damage Amount	TOTAL Damage Amount
1.	Ronald	Philip	Kloepfer		\$3,604,486.00	\$2,000,000.00	\$5,604,486.00
2.	Louis	N.	Mariani		\$0.00	\$2,000,000.00	\$2,000,000.00
3.	John		Rhodes		\$0.00	\$2,000,000.00	\$2,000,000.00

TOTALS

					\$3,604,486.00	\$6,000,000.00	\$9,604,486.00
--	--	--	--	--	----------------	----------------	-----------------------